

GHAJAR EXHIBIT 32

12/5/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Subject to Protective Order

Sy Choudhury

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)

)

Individual and)

Representative)

Plaintiffs,)

)

v.)

)

META PLATFORMS, INC.,)

)

Defendant.)

)

Case No. 3:23-cv-03417-VC

** HIGHLY CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER **

Videotaped Deposition of SY CHOUDHURY

San Francisco, California

Thursday, December 5, 2024

Reported Stenographically by
Michael P. Hensley, RDR, CSR No. 14114

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1 BY ATTORNEY PRITT:

2 Q. Thank you.

3 Good morning.

4 A. Good morning.

5 Q. Can you please state and spell your full
6 name.

7 A. Sure. My formal name is Sayeed Choudhury,
8 I go by Sy. Sayeed Zaman Choudhury. S-a-y-e-e-d
9 Z-a-m-a-n C-h-o-u-d-h-u-r-y.

10 Q. Thank you. Can you please state your home
11 address.

14 Q. Okay. And are you presently employed?

15 A. Yes.

16 Q. By whom?

17 A. Meta Platforms, Inc.

18 Q. And what is your current title?

19 A. My current title is director of business
20 development, AI platform -- AI partnerships.

21 Q. And just to be clear -- so it's director
22 of business development for AI partnerships; is that

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1 right?

2 A. Correct. That's right.

3 Q. Okay. Have you ever testified before?

4 A. No.

5 Q. Have you ever been deposed before?

6 A. No.

7 Q. Oh.

8 Well, I'm -- I know Kathleen has talked to
9 you about what the deposition is like, and so I'm
10 sure a lot this will, you know, go over the same
11 subjects she has in terms of, you know, guidelines
12 that we try to follow during depositions just to
13 make it easier for both of us, Kathleen, and the
14 Court Reporters.

15 So the first thing I would ask is: If you
16 find a question that I ask confusing, or you just
17 want me to restate it for any reason just please
18 ask. I'm happy to do that. I'll either read it
19 back, or if there was something confusing about my
20 question and you didn't understand, I can try and
21 restate the question.

22 A. Okay.

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1 Q. But you took the position before October
2 of last year; right?

3 A. No. So I was a -- he was also a director.
4 He was a senior director.

5 Q. Oh. So there were two directors and now
6 there's one?

7 A. That's right.

8 Q. Okay.

9 Can you describe your primary
10 responsibilities in your current role.

11 A. So, I lead up -- I lead up -- I -- I
12 manage and support a set of business development
13 managers. Our role, whether we're doing something
14 as individual contributor or as the team, is to
15 enable and -- enable all of our third-party
16 partnerships that are topically around AI, and
17 specifically the -- the product teams that focus on
18 AI, the product end technology teams that work on
19 AI.

20 Q. So your responsibility is to enable Meta's
21 third-party partnerships around AI?

22 A. Correct and --

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1 Q. And what does that mean?

2 A. It -- it -- it -- it can span anything.

3 And why I say that is because we are the business

4 and -- the business service organization, if you

5 might call it that, to help the product and

6 engineering -- product managers and the engineers to

7 do anything that has to do with outside parties.

8 Some of that is to look for new

9 information. Some of that is to help finalize an

10 agreement. Some of that is just to manage a

11 third-party partner. So there's a -- there's a wide

12 variety of activities that we do, and it's really on

13 a case-by-case basis based on what that specific

14 subteam within the AI organization requires at that

15 time.

16 Q. Hmm.

17 And do those responsibilities include

18 commercializing AI at Meta?

19 A. We are not the product and engineering

20 team; so we don't do the product development to

21 commercialize, but if there's anything that's

22 required from a third-party, either for research --

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1 pure research or for -- for commercial use, then,
2 yes, then we're part of the cross-functional team.

3 Q. And that would include commercialization
4 for large language models; is that right?

5 A. That's correct.

6 Q. And do the responsibilities include
7 monetizing AI at Meta?

8 A. No.

9 Q. Do the responsibilities include monetizing
10 large language models?

11 A. No.

12 Q. Then who does that?

13 ATTORNEY HARTNETT: Object to the form.

14 THE WITNESS: We -- we -- we use large
15 language models to enable a -- a variety of goods
16 and services that are further downstream, and so I'm
17 not involved in -- in that. I'm involved in
18 supporting the product and engineering teams much
19 more upstream of whatever uses we have, whether it
20 is internal, external, monetized or not monetized.

21 BY ATTORNEY PRITT:

22 Q. But so do you know who at Meta works on

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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Michael P. Hensley, Registered Diplomate

4 Reporter for the State of California, CSR No. 14114,

5 the officer before whom the foregoing deposition was

6 taken, do hereby certify that the foregoing

7 transcript is a true and correct record of the

8 testimony given; that said testimony was taken by me

9 stenographically and thereafter reduced to

10 typewriting under my direction; that reading and

11 signing was not requested; and that I am neither

12 counsel for, related to, nor employed by any of the

13 parties to this case and have no interest, financial

14 or otherwise, in its outcome.

15

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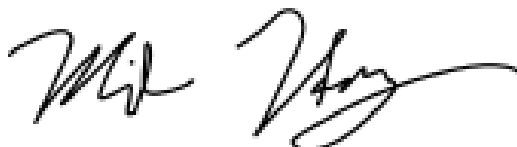
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Michael P. Hensley, CSR, RDR